

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

MATAN GOLDSTEIN,

Plaintiff,

V.

THE RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA, *et al.*,

Defendants.

CIVIL ACTION NO.
3:24-cv-00036-RSB-JCH

CONSENT & UNOPPOSED MOTION TO EXTEND

COMES NOW Plaintiff Matan Goldstein, by and through undersigned counsel, with the consent of all parties, through their respective counsel, and, pursuant to Local Rule 11(c)(1), respectfully moves the Honorable Court for an Order extending the time allowed for the Plaintiff to respond to Defendants UVA, Ryan, and Hardie's pending Motions to Dismiss (Dkt. No. 26) from July 31, 2024, to August 6, 2024.

In support of this motion, the Plaintiff, through undersigned counsel, respectfully states and submits to the Honorable Court that the deadlines for the Plaintiff to respond to Defendants' SJP at UVA and FJP at UVA's pending motions to dismiss was extended to August 6, 2024, as was the Plaintiff's deadline to amend the Complaint as a matter of course pursuant to 15(a)(1)(B). The Plaintiff respectfully reiterates notice of his intent to amend the Complaint as a matter of course on or before August 6, 2024, which will supersede the original Complaint and the pending motions. The Plaintiff respectfully seeks to harmonize current pending deadlines and respectfully seeks to avoid unnecessary motions practice and expenditure of resources. Undersigned counsel for the Plaintiff has conferred with counsel for all parties who have consented to this motion and approved

the language in the proposed Order. Therefore, this motion is unopposed. The Plaintiff further respectfully represents that this complex constitutional and civil rights matter is being diligently prosecuted and defended by all parties and their counsel, that this motion is not interposed for any improper purpose, and finally, that the extensions of time will not cause any delays to trial, discovery, or disposition of this matter.

A proposed Order, attached as Exhibit A, has been signed and approved by Plaintiff's counsel and counsel for all Defendants and submitted to the Court.

Date: July 17, 2024,

Respectfully submitted,

MATAN GOLDSTEIN

By his counsel:

/s/ Gregory W. Brown

GREGORY W. BROWN – VA Bar # 36369

KRISTI L. GAVALIER – VA Bar # 96707

BROWN & GAVALIER, PLLC

320 West Main Street

Charlottesville, Virginia 22903

Telephone & Facsimile (One Talk): 434-996-2606

partners@brownandgavalier.com (Lawyers' Email)

admin@brownandgavalier.com (CM/ECF)

Counsel for Matan Goldstein

WE CONSENT:

/s/ Kelly Orians

Kelly Orians (VSB No. 98047)
580 Massie Road
Charlottesville, Virginia 22903
keorians@gmail.com
Counsel for Defendants SJP and FJP

/s/ Asim Ghafoor

Asim Ghafoor (*pro hac vice*)
LAW OFFICE OF ASIM GHAFOR
23465 Rock Haven Way, Suite 100
Dulles, Virginia 20166
asim@glawoffice.com
Counsel for Defendants SJP and FJP

/s/ Jonathan Wallace

Jonathan Wallace (*pro hac vice*)
Post Office Box 728
Amagansett, New York 11930
jonathan.wallace80@gmail.com
Counsel for Defendants SJP and FJP

/s/ Jonathan T. Blank

Jonathan T. Blank (VSB No. 38487)
MCGUIREWOODS LLP
323 2nd St. SE, Suite 700
Charlottesville, VA 22902
Tel.: (434) 977-2509
Fax: (434) 980-2258
jblank@mcguirewoods.com
Counsel for Defendants UVA, Ryan, and Hardie

/s/ Farnaz F. Thompson

Farnaz F. Thompson (VSB No. 75982)
MCGUIREWOODS LLP
888 16th Street N.W., Suite 500
Black Lives Matter Plaza
Washington, D.C.
Tel: (202) 857-1000
Fax: (202) 857-2737
fthompson@mcguirewoods.com
Counsel for Defendants UVA, Ryan, and Hardie

/s/ Heidi E. Siegmund

Heidi E. Siegmund (VSB No. 89569)

/s/ Juliet B. Clark

Juliet B. Clark (VSB No. 96918)

McGUIREWOODS LLP

800 East Canal Street

Richmond, VA 23219

Tel.: (804) 775-1000

Fax: (804) 775-1061

hsiegmund@mcguirewoods.com

jbclark@mcguirewoods.com

Counsel for Defendants UVA, Ryan, and Hardie

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2024, I will electronically mail (email) a copy of the foregoing to the following individuals and I will electronically file a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

<p>Kelly Orians (VSB No. 98047) 580 Massie Road Charlottesville, Virginia 22903 keorians@gmail.com <i>Counsel for Defendants SJP at UVA and FJP at UVA</i></p>	<p>Jonathan T. Blank (VSB No. 38487) McGUIREWOODS LLP 323 2nd St. SE, Suite 700 Charlottesville, VA 22902 Tel.: (434) 977-2509 Fax: (434) 980-2258 jblank@mcguirewoods.com <i>Counsel for Defendants UVA, Ryan, and Hardie</i></p>
<p>Asim Ghafoor (<i>pro hac vice</i>) LAW OFFICE OF ASIM GHAFOR 23465 Rock Haven Way, Suite 100 Dulles, Virginia 20166 asim@glawoffice.com <i>Counsel for Defendants SJP at UVA and FJP at UVA</i></p>	<p>Farnaz F. Thompson (VSB No. 75982) McGUIREWOODS LLP 888 16th Street N.W., Suite 500 Black Lives Matter Plaza Washington, D.C. Tel: (202) 857-1000 Fax: (202) 857-2737 fthompson@mcguirewoods.com <i>Counsel for Defendants UVA, Ryan, and Hardie</i></p>
<p>Jonathan Wallace (<i>pro hac vice</i>) Post Office Box 728 Amagansett, New York 11930 jonathan.wallace80@gmail.com <i>Counsel for Defendants SJP at UVA and FJP at UVA</i></p>	<p>Heidi E. Siegmund (VSB No. 89569) Juliet B. Clark (VSB No. 96918) McGUIREWOODS LLP 800 East Canal Street Richmond, VA 23219 Tel.: (804) 775-1000 Fax: (804) 775-1061 hsiegmund@mcguirewoods.com jbclark@mcguirewoods.com <i>Counsel for Defendants UVA, Ryan, and Hardie</i></p>

/s/ Gregory W. Brown

BROWN & GAVALIER, PLLC